Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

MEMO ENDORSED

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

October 26, 2023

BY ECF

Honorable Judge Edgardo Ramos United States District Judge Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007

Re: <u>United States v. Erik Ciriaco</u>

21 Cr. 450 (ER)

Dear Judge Ramos,

With the consent of the Government, I write to request that the Court extend the deadline for Mr. Ciriaco's sentencing submission to October 30, 2023, with the Government's Submission due the following week on November 6. The defense requests this additional time to finish gathering and updating Mr. Ciriaco's mitigation materials to aid in the Court's assessment of the appropriate sentence under 18 U.S.C. 3553(a).

Thanks you for your consideration of this request.

Respectfully submitted,

/s/

Zawadi Baharanyi
Assistant Federal Defender of New York
Counsel for Humberto Bello

cc: AUSA Kaylan Lasky.

SO ORDERED:

HONORABLE EDGARDO RAMOS United States District Judge

Dated: October 27, 2023